



April 5, 2019

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Attention: Ms. Kimberly D. Bose, Secretary

Re: Sierrita Gas Pipeline LLC;
Docket Nos. CP18-37-000;
Sierrita Compressor Expansion Project;
Request for Partial Notice to Proceed with Construction

Commissioners:

Sierrita Gas Pipeline LLC ("Sierrita") is hereby filing with the Federal Energy Regulatory Commission ("Commission") in Docket No. CP18-37-000 a request for written authorization to commence partial construction activities associated with the Sierrita Compressor Expansion Project.

Description of Proceeding

On December 21, 2017, Sierrita submitted its application, pursuant to Section 7(c) of the Natural Gas Act requesting a certificate of public convenience and necessity for authorization to construct, install, and operate a new compressor ("Sierrita Compressor Station") to be located in Pima County, Arizona. The project is referred to as the "Sierrita Compressor Expansion Project."

Request for Partial Notice to Proceed

On April 1, 2019, CFE International LLC ("CFEi")¹ asked Sierrita if it would schedule interruptions of service associated with construction of the Sierrita Compressor Expansion Project between April 30, 2019 – May 2, 2019. Doing so would minimize potential outages at downstream power plants located in northwestern Mexico that rely on natural gas supplies transported by Sierrita. In order to accommodate CFEi's request, Sierrita would need to undertake certain minor work associated with the relocation of Mainline Valve 2 ("MLV 2") and the inspection tool launcher and receiver (i.e., pig trap assembly) located at Milepost ("MP") 1.2 on Line No. 2177 prior to initiating project-wide construction activities for its expansion project. Specifically, Sierrita would disconnect the existing mainline valve and pig trap assembly and install

¹ CFEi is a wholly-owned affiliate of the Comisión Federal de Electricidad (CFE) which is owned by the Mexican Government and manages all of CFE's U.S. natural gas business. CFEi is the expansion shipper for the Sierrita Compressor Expansion Project and is the only firm shipper on the Sierrita pipeline.

an approximate 320-foot 36" pipeline bypass as described in its original application scope.² All the proposed construction activity would occur within the previously surveyed and approved workspace location. The disassembly of the existing pig trap assembly and MLV 2 would not be undertaken at this time. Further, Sierrita would seek authorization to start construction on the rest of its proposed expansion project facilities at a later date.

Accordingly, Sierrita is looking to initiate construction on a limited portion of its overall expansion project and is seeking Director of Office of Energy Projects authorization to initiate construction on the facilities described above by no later than April 09, 2019. An approval by this date will allow Sierrita to accommodate CFEi's requested April 30, 2019 – May 2, 2019 outage period. In support of this request, Sierrita hereby submits the following supplemental information in support of its requested partial notice to proceed with construction.³

Environmental Condition No. 5

Sierrita is submitting a detailed alignment map/sheet showing the location of Sierrita's MLV 2 and the associated pig trap assembly location illustrating for the limited scope of construction. Please see Attachment 1 behind this letter.

Environmental Condition No. 6

Consistent with its previous commitment regarding this condition, Sierrita will assign one Environmental Inspector ("EI") during this initial construction activity and will ensure that sufficient personnel are available to implement environmental mitigation measures. In addition, the EI will provide initial environmental training to all personnel who will be involved with these construction activities.

Environmental Condition No. 8

Consistent with its previous commitment on filing status reports, Sierrita agrees to commence filing biweekly status reports after approval of its requested partial notice to proceed with construction and once training and construction activities begin.

Environmental Condition No. 9

Sierrita agrees to this condition and has reviewed all applicable authorizations required and federal law for the construction activities. Sierrita notes that there are no additional permits needed for this limited construction activities beyond those that have been already identified and provided. The proposed construction will be confined to the existing easement granted by Arizona State Land Department in 2014. Sierrita did send landowner notice letter dated April, 2, 2019 to Arizona State Land Department advising them that it intended to initiate construction activities in April 2019.

² The work will entail trenching, welding, hydrostatic testing of the 36" bypass pipeline and completing tie-ins back into the mainline.

³ On December 20, 2018, Sierrita filed its Implementation Plan and Affirmative Statement for the Sierrita Compressor Expansion Project.

Environmental No. 12

The EA issued for the Sierrita Compressor Expansion Project referenced Pima County Office of Sustainability & Conservation – Environmental planning comments regarding efforts to discourage off-highway vehicle use in and around the new Sierrita Compressor Station. In its Implementation Plan, Sierrita agreed to provide the Commission (for review and approval) descriptions and locations of signage and any additional measures to be employed and maintained in order to deter unauthorized off-highway vehicle use during construction and operation of project facilities. Sierrita will provide this information when it submits its request for a project wide notice to proceed with construction. Since the MLV 2/pig trap facility is located approximately 4 miles away from the proposed compressor station and since no new additional linear right-of-way is being requested, the signage and related measures aimed at discouraging unauthorized off-highway vehicle are not applicable at this location.

Environmental No. 13

Sierrita has agreed to comply with this condition and will work with the City of Tucson Water Department to perform pre- and post-construction testing of the water well identified within 100 feet of the construction work areas in the vicinity of the proposed compressor station. Sierrita notes that the limited construction activities being requested are located approximately 4 miles away from the well. Hence, the pre-construction water testing will be done prior to commencing the construction activities at the proposed compressor station site.

Filing Information

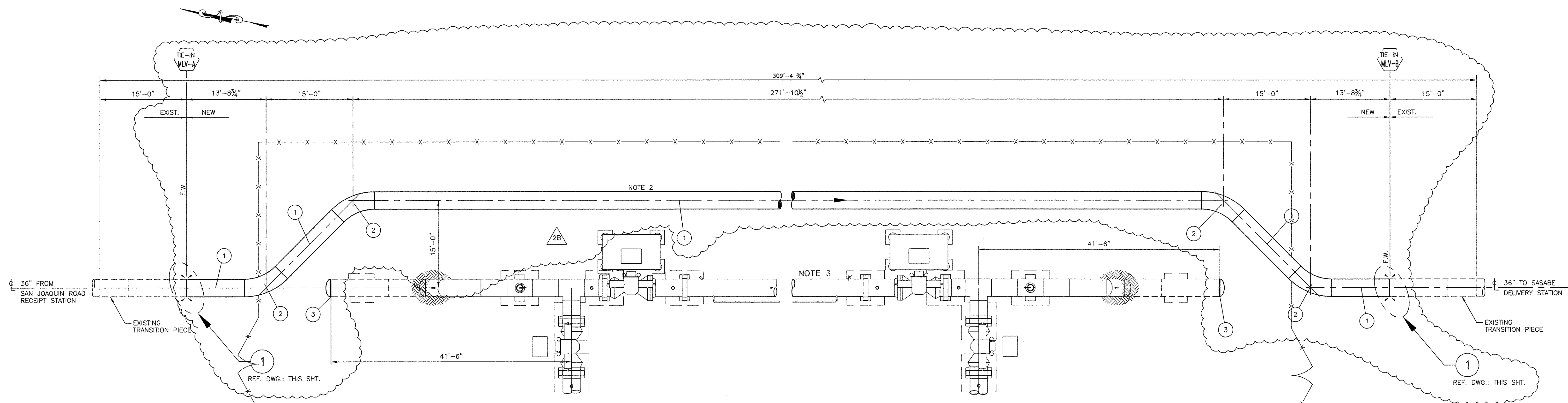
Sierrita is e-Filing this request for a limited, partial notice to proceed with construction with the Commission's Secretary in accordance with the Commission's Order No. 703, *Filing Via the Internet*, guidelines issued on November 15, 2007 in Docket No. RM07-16-000.

Respectfully submitted,

SIERRITA GAS PIPELINE LLC

By /s/
Francisco Tarin
Director, Regulatory

Attachment



NOTES:

1. SITE TO BE RESTORED TO NATIVE SOIL AND PLANT LIFE. ALL PIPING, CONCRETE, FENCING, ELECTRICAL, AND CONTROL SYSTEMS TO BE REMOVED.
2. ALL NEW PIPING TO MATCH EXISTING PIPELINE ELEVATION. HIGH PRESSURE GAS PIPING SHALL BE INSTALLED WITH MINIMUM 3 FEET OF COVER.
3. LAUNCHER / RECEIVER TO BE CAPPED AND REMAIN IN PLACE UNTIL SIERRITA C.S. CONSTRUCTION.

PIPELINE OFFSET SITE PLAN

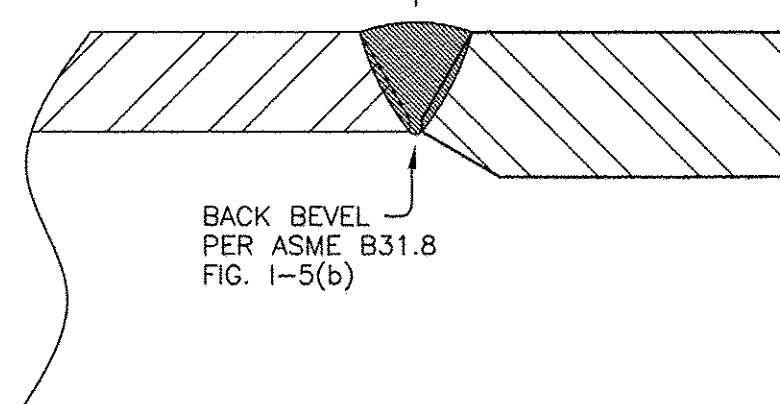
BILL OF MATERIAL

MARK	PS ITEM ID	QTY	UNITS	SC	DESCRIPTION
1		312	L.F.		PIPE - 36" NOMINAL DIAMETER, 0.750" WT, SAWL, PLAIN END, API 5L-PSL2, GR X-70; MATL SPEC M8220, COAT SPEC M8370, FBE (14-16 MILS)
2		4	EA.		ELL, 45°, 3R - 36", 0.750" WT, BW, GR WPHY-70, ASME B16.9; MATL SPEC M8110
3		2	EA.		CAP, WELD - 36", 0.750" WT, BW, GR WPHY-70, ASME B16.9; MATL SPEC M8110 (TEMPORARY MATERIAL FOR MLV-2 PIPELINE LAUNCHER / RECEIVER WHILE STILL IN PLACE)

EXISTING 36" P/L NEW 36" 0.750" W.T.

GR. X70 GR. X70

CONTRACTOR TO FIELD VERIFY WALL THICKNESS TO DETERMINE BACK BEVEL DIMENSIONS AS NEEDED



DETAIL

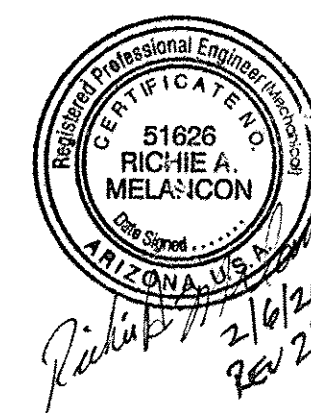
SCALE: NTS

REF. DWG.: THIS SHT.

ISSUED BY:
Waldemar S. Nelson & Co.
FOR APPROVAL

FEB 06 2019

NOT FOR CONSTRUCTION



SCALE IN FEET
8' 4' 0' 8'

Revision	Description	Project ID	Date
2B	ISSUED FOR APPROVAL	205523	02-06-2019
1	AS-BUILT	064701	09-05-2017
0	ISSUED FOR CONSTRUCTION	64700	05-16-2014

Notes:

KINDER MORGAN

EL PASO NATURAL GAS

Reference Drawings

PIPELINE OFFSET

36" NATURAL GAS PIPELINE
SIERRITA 36" LATERAL LINE NO. 2177

Status:	ISSUED FOR APPROVAL
State:	ARIZONA
County:	PIMA
Category:	DETAIL
File Name:	2177.0-1H.dwg
Drawing No:	2177.0-1H

FIELD VERIFICATION REQUIRED

Certificate of Service

I hereby certify that I have this day caused a copy of the foregoing document to be served upon each person designated on the official service list compiled by the Commission's Secretary in this proceeding in accordance with the requirements of Section 385.2010 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure.

Dated at Colorado Springs, Colorado as of this 5th day of April, 2019.

/s/

Francisco Tarin

Two North Nevada Avenue
Colorado Springs, Colorado 80903
(719) 667-7517